# LARSON · KING

PETER J. GLEEKEL

Direct Dial: (651) 312-6555 E-Mail: pgleekel@larsonking.com

May 14, 2018

#### **VIA E-FILE**

Honorable Kevin W. Eide Judge of District Court Carver County Justice Center 604 East 4<sup>th</sup> Street Chaska, MN 55318

Re:

Matter of the Estate of Prince Rogers Nelson

Court File No. 10-PR-16-46

Dear Judge Eide:

We are providing the Court our Statement for Professional Services and Disbursements Rendered through April 30, 2018 in connection with our appointment as the Second Special Administrator in the above-referenced matter. We are simultaneously providing to counsel for Comerica Bank & Trust, N.A. a copy of our Statement for Professional Services and Disbursements Rendered through April 30, 2018.

We are also providing the Court our Statements for Professional Services and Disbursements Rendered through February 28, 2018, which has a balance due of \$174.20 and also through March 31, 2018, which has a balance due of \$3,574.98.

In the event you have any questions, please do not hesitate to contact us. It is our understanding that with submission of our Statement, it will be paid upon approval by the Court.

Sincerely

Peter J. Gleekel

PJG/jh Enclosure

cc:

Mark W. Greiner (w/enc.) (via email)

Joseph J. Cassioppi (w/enc.) (via email)

1715355

2800 Wells Fargo Place 30 East 7th Street Saint Paul, Minnesota 55101-4922

Federal Tax ID No.: 41-1925028 Telephone: (651) 312-6589 or (651)312-6579

Facsimile: (651) 312-6618

CARVER COUNTY DISTRICT COURT

ATTN: YVONNE SHIRK **604 EAST FOURTH STREET** CHASKA, MN 55318

INVOICE DATE: 05/11/2018

FILE #: 50560001

INVOICE NUMBER:

71332

ATTORNEY: PETER GLEEKEL

OFFICE: SAINT PAUL

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FOR PROFESSIONAL SERVICES & DISBURSEMENTS RENDERED THROUGH: April 30, 2018

**MATTER** 

**LEGAL FEES** 

**DISBURSEMENTS** 

**TOTAL** 

File #: 50560001

17,530.00

2,086.89

19,616.89

TOTAL DUE THIS INVOICE:

\$ 19,616.89

ESTATE OF PRINCE ROGERS NELSON RE: PROBATE

	OU	TSTANDING INVOICES		
DATE	INVOICE	AMOUNT	PAYMENT	BAL DUE
03/14/2018	70760	\$ 20,360.20	\$ 20,186.00	\$ 174.20
04/11/2018	71024	\$ 49,167.98	\$ 45,593.00	\$ 3,574.98
05/11/2018	71332	\$ 19,616.89	\$ 0.00	\$ 19,616.89

Last Bill Date: 05/11/2018

Date of Last Payment: 04/19/2018

Amount of Last Payment: \$45,593.00

2800 Wells Fargo Place 30 East 7th Street Saint Paul, Minnesota 55101-4922 Federal Tax ID No.: 41-1925028 Telephone: (651) 312-6589 or (651)312-6579 Facsimile: (651) 312-6618

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CARVER COUNTY DISTRICT COURT ATTN: YVONNE SHIRK 604 EAST FOURTH STREET CHASKA, MN 55318 FILE #: 50560001
INVOICE DATE: 05/11/2018
INVOICE NUMBER: 71332
ATTORNEY: PETER GLEEKEL
OFFICE: SAINT PAUL

PAGE:

DATE	NAME	DESCRIPTION OF SERVICES	HOURS
04/02/2018	МТВ	CONFER REGARDING KOPPELMAN/CAK INTERVIEW; REVIEW ADDITIONAL DOCUMENTS FROM COUNSEL RELATING TO JOBU	0.90
04/02/2018	PJG	RELATIONSHIP AND ATTEND TO DOCUMENT DATABASE CONFER REGARDING KOPPELMAN/CAK INTERVIEW AND STRATEGY IN LIGHT THEREOF; CONFER WITH COUNSEL FOR COMERICA REGARDING STATUS OF INVESTIGATION ON JOBU TRANSACTION INCLUDING ONGOING "TO DO" LIST, ETC.	1.20
04/03/2018	PJG	CORRESPONDENCE WITH COUNSEL FOR STINSON LEONARD REGARDING INTERVIEWS OF MS. HALFERTY AND MS. BRANSFORD	0.20
04/05/2018	BRP	RESEARCH MINNESOTA LAW RE POTENTIAL THEORIES OF LIABILITY IN CONNECTION WITH JOBU TRANSACTION	0.40
04/08/2018	PJG	MULTIPLE CORRESPONDENCE WITH COUNSEL FOR MR. MCMILLAN REGARDING INTERVIEW OF MR. MCMILLAN	0.30
04/16/2018	BRP	CONTINUED RESEARCH OF POTENTIAL THEORIES OF LIABILITY IN CONNECTION WITH JOBU TRANSACTION RESEARCH AND DAMAGES THEORIES	1.50
04/16/2018	PJG	REVIEW AND STUDY LEGAL RESEARCH MEMORANDUM AND SELECTED CASE LAW; CONFER REGARDING SAME AND ADDITIONAL ANALYSIS IN CONNECTION THEREWITH	2.90
04/17/2018	BRP	RESEARCH ALL STATES PROBATE LAW RE: POTENTIAL THEORIES OF LIABILITY IN CONNECTION WITH JOBU TRANSACTION	5.10
04/17/2018	PJG	CONFER WITH COUNSEL FOR OMARR BAKER REGARDING QUESTIONS CONCERNING STATUS OF INVESTIGATION; COMMENCE REVIEW AND STUDY OF DOCUMENTS PRODUCED BY MR. MCMILLAN	3.90
04/18/2018	PJG	CONTINUE AND COMPLETE REVIEW OF DOCUMENTS PRODUCED BY MR. MCMILLAN	3.40
04/19/2018	BRP	CONTINUED RESEARCH RE POTENTIAL THEORIES OF LIABILITY IN CONNECTION WITH JOBU TRANSACTION	4.70
04/19/2018	MTB	PREPARE KEY DOCUMENTS FOR COUNSEL FOR WITNESS INTERVIEWS	0.50
04/19/2018	PJG	CONFER REGARDING STRATEGY IN RESPECT OF INTERVIEW OF STINSON LEONARD LAWYERS HALFERTY AND BRANSFORD, ETC.; PREPARE FOR INTERVIEW OF STINSON LEONARD LAWYERS HALFERTY AND BRANSFORD	5.70
04/20/2018	PJG	CONTINUED PREPARATION FOR INTERVIEW OF STINSON LEONARD LAWYERS HALFERTY AND BRANSFORD; APPEAR AND CONDUCT INTERVIEWS OF STINSON LEONARD LAWYERS HALFERTY AND BRANSFORD	6.80
04/20/2018	BRP	PARTICIPATE IN INTERVIEWS OF STINSON LEONARD STREET ATTORNEYS HALFERTY AND BRANSFORD	4.00

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CARVER COUNTY DISTRICT COURT ATTN: YVONNE SHIRK 604 EAST FOURTH STREET

CHASKA, MN 55318

FILE #: 50560001 INVOICE DATE: 05/11/2018

INVOICE NUMBER: 71332

ATTORNEY: PETER GLEEKEL OFFICE: SAINT PAUL

PAGE:

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DATE	NAME	DESCRIPTION OF SERVICES	HOURS
04/23/2018	МТВ	FACTUAL RESEARCH REGARDING JOBU CONTRACT ISSUES FOR COUNSEL	0.50
04/23/2018	PJG	CONFER WITH COUNSEL FOR OMARR BAKER REGARDING STATUS OF JOBU INVESTIGATION	0.80
04/26/2018	MTB	PREPARE KEY DOCUMENTS FOR COUNSEL RELATING TO JOBU ISSUE	0.30
04/26/2018	PJG	CORRESPONDENCE WITH COUNSEL FOR BREMER TRUST FOLLOWING UP ON BREMER TRUST INTERVIEWS	0.20
04/26/2018	BRP	RESARCH PARTIAL PERFORMANCE OF CONTRACT AND AFFECT ON VALIDITY OF CONTRACT	1.30
04/26/2018	BRP	DRAFT MEMORANDUM OF LAW ANALYZING BREACH OF THE JOBU CONTRACT AND THE NATURE OF THE ADVISORS RELATIONSHIP TO THE ESTATE	1.70
04/30/2018	BRP	CONTINUED PREPARATION OF MEMORANDUM ANALYZING JOBU TRANSACTION AND POTENTIAL LIABILITY ARISING THEREFROM	2.80
04/30/2018	MTB	FACTUAL RESEARCH FOR COUNSEL REGARDING POTENTIAL CLAIMS FOR ESTATE	0.40
04/30/2018	PJG	ADDITIONAL CORRESPONDENCE WITH COUNSEL FOR MR. MCMILLAN REGARDING INTERVIEW OF MR. MCMILLAN; ADDITIONAL RESEARCH REGARDING POTENTIAL CAUSES OF ACTION FOR BREACH OF FIDICUARY DUTY, BREACH OF CONTRACT, ETC.; CONFER WITH COUNSEL FOR COMERICA REGARDING STATUS OF INVESTIGATION ON JOBU TRANSACTION	4.40
TOTAL HOU	JRS:	53.90 TOTAL SERVICES:	\$ 17,530.00

#### TIMEKEEPER SUMMARY

<u>EMPL</u>	<u>INIT</u>	NAME	RANK	<u>HOURS</u> BILLED	BILLING RATE	<u>AMOUNT</u>
0140	PJG	PETER J. GLEEKEL	PARTNER	29.80	430.00	12,814.00
0149	BRP	BRADLEY R. PROWANT	ASSOCIATE	21.50	200.00	4,300.00
1351	MTB	MARK T. BURNS	PARALEGAL	2.60	160.00	416.00

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CARVER COUNTY DISTRICT COURT ATTN: YVONNE SHIRK 604 EAST FOURTH STREET CHASKA, MN 55318 FILE #: 50560001 INVOICE DATE: 05/11/2018 INVOICE NUMBER: 71332

ATTORNEY: PETER GLEEKEL
OFFICE: SAINT PAUL
PAGE: 4

DATE	DESCRIPTION OF DISBURSEMENT	COST
04/01/2018	Online Research - VENDOR: THOMSON REUTERS- WEST; INVOICE#:	1,606.79
	837943637; DATE: 4/1/2018 - MARCH 2018 ONLINE RESEARCH	
04/03/2018	Out-Of-Town Travel - VENDOR: PROWANT, BRADLEY R.; INVOICE#:	413,32
	APR032018; DATE: 4/3/2018 - ATTEND INTERVIEW OF CHARLES	
	KOPPELMAN IN NEW YORK, NY FROM 3/28 - 3/29- HOTEL AND	
	TAXIS	
04/03/2018	Meals - VENDOR: PROWANT, BRADLEY R.; INVOICE#: APR032018;	29.18
-	DATE: 4/3/2018 - ATTEND INTERVIEW OF CHARLES KOPPELMAN	
	IN NEW YORK, NY FROM 3/28 - 3/29- MEALS	
04/24/2018	Local Travel - VENDOR: GLEEKEL, PETER J.; INVOICE#: APR242018;	24.00
	DATE: 4/24/2018 - ATTEND INTERVIEWS OF LAURA HALFERTY	
	AND TRACI BRANSFORD IN MPLS ON 4/20 - PARKING	
	Photocopy Expense - (136 @ 0.10 / PAGE)	13.60
	TOTAL DISBURSEMENTS:	\$ 2,086.89

DISBURSEMENT CODE	NAME	COST
101	Photocopy Expense	13.60
106	Online Research	1,606.79
109	Local Travel	24.00
110	Out-Of-Town Travel	413.32
111	Meals	29.18
		\$ 2,086.89

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CARVER COUNTY DISTRICT COURT

ATTN: YVONNE SHIRK **604 EAST FOURTH STREET** 

CHASKA, MN 55318

FILE #: 50560001

INVOICE DATE: 03/14/2018

INVOICE NUMBER: 70760

ATTORNEY: PETER GLEEKEL

OFFICE: SAINT PAUL

PAGE:

#### FOR PROFESSIONAL SERVICES & DISBURSEMENTS RENDERED THROUGH: February 28, 2018

<u>MATTER</u>	<u>LEGAL FEES</u>	<b>DISBURSEMENTS</b>	TOTAL
File #: 50560001	20,186.00 <b>PAYMEN</b>	174.20 T RECEIVED: 3/12/18	20,360.20 <b>-20,186.00</b>
	TOTAL	DUE THIS INVOICE:	\$ 174.20

#### ESTATE OF PRINCE ROGERS NELSON RE: PROBATE

	OU	TSTANDING INVOICES		
DATE	INVOICE	AMOUNT	PAYMENT	BAL DUE
03/14/2018	70760	\$ 20,360.20	\$ 20,186.00	\$ 174.20
04/11/2018	71024	\$ 49,167.98	\$ 45,593.00	\$ 3,574.98
05/11/2018	71332	\$ 19,616.89	\$ 0.00	\$ 19,616.89

Last Bill Date: 05/11/2018

Date of Last Payment: 04/19/2018

Amount of Last Payment: \$45,593.00

2800 Wells Fargo Place 30 East 7th Street Saint Paul, Minnesota 55101-4922

Federal Tax ID No.: 41-1925028 Telephone: (651) 312-6589 or (651)312-6579 Facsimile: (651) 312-6618

CARVER COUNTY DISTRICT COURT ATTN: YVONNE SHIRK 604 EAST FOURTH STREET CHASKA, MN 55318

FILE #: 50560001 INVOICE DATE: 03/14/2018 INVOICE NUMBER: 70760 ATTORNEY: PETER GLEEKEL OFFICE: SAINT PAUL

PAGE:

DATE	NAME	DESCRIPTION OF SERVICES	HOURS
02/02/2018	PJG	REVIEW AND STUDY COURT ORDER EXPANDING AUTHORITY OF SECOND SPECIAL ADMINISTRATOR	0.20
02/02/2018	MTB	COURT REVIEW ORDER RE EXPANDING SECOND SPECIAL	0.20
02/05/2018	PJG	ADMINISTRATION CONFER WITH COUNSEL FOR COMERICA REGARDING ORDER EXPANDING AUTHORITY OF SECOND SPECIAL ADMINISTRATOR AND RELEVANT DOCUMENTATION IN CONNECTION THEREWITH; COMMENCE FACTUAL INVESTIGATION OF JOBU PRESENTS AND PRESS RELEASES CONCERNING TRIBUTE CONCERT DISPUTE; REVIEW AND STUDY COMPLAINT OF JOBU PRESENTS V. BREMER TRUST, ETAL	4.80
02/05/2018	MTB	REVIEW PLEADINGS AND ADDITIONAL DOCUMENTS RELATING TO JOBU DISPUTE, ORGANIZE AND PREPARE KEY DOCUMENTS FOR COUNSEL REVIEW	3.70
02/06/2018	PJG	CONSEL REVIEW  CONFER WITH COUNSEL FOR ALFRED JACKSON REGARDING GENERAL BACKGROUND ON JOBU PRESENTS TRANSACTION FROM HIS PERSPECTIVE AND THOUGHTS IN CONNECTION THEREWITH; CONFER WITH COUNSEL FOR JOBU PRESENTS REGARDING JOBU PRESENTS AND POSITION ON FACTUAL BACKGROUND; INITIAL REVIEW AND STUDY OF EMAILS AND RELEVANT DOCUMENTATIONS WITH RESPECT TO JOBU PRESENTS AGREEMENT AND TRIBUTE CONCERT RECEIVED FROM COUNSEL FOR COMERICA	5.20
02/07/2018	PJG	CONTINUE AND COMPLETE INITIAL REVIEW OF EMAILS AND RELEVANT DOCUMENTATION PERTAINING TO JOBU PRESENTS TRANSACTION AND TRIBUTE CONCERT TOGETHER WITH SELECTED PLEADINGS WITH RESPECT THERETO; CONFER REGARDING SAME	4.70
02/07/2018	MTB	PREPARE ADDITIONAL DOCUMENTS FOR COUNSEL RELATING TO JOBU COMPLAINT	0.40
02/08/2018	PJG	ADDITIONAL FACTUAL INVESTIGATION IN RESPECT OF JOBU PRESENTS TRANSACTION	0.50
02/09/2018	PJG	REVIEW AND STUDY MULTIPLE PLEADINGS IN JOBU PRESENTS	2.80
02/12/2018	PJG	LAWSUIT AGAINST MESSRS. KOPPELMAN, MCMILLAN, ET AL. PREPARE INITIAL DRAFT DOCUMENT REQUESTS TO BREMER TRUST AND STINSON LEONARD, CHARLES KOPPELMAN AND LONDELL MCMILLAN; PREPARE CORRESPONDENCE TO COUNSEL FOR BREMER TRUST, STINSON LEONARD, CHARLES KOPPELMAN AND LONDELL MCMILLAN REGARDING REQUESTS FOR PRODUCTION OF DOCUMENTS AND REQUEST FOR AN INTERVIEW IN RESPECT OF JOBU PRESENTS TRANSACTION	3.80

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CARVER COUNTY DISTRICT COURT ATTN: YVONNE SHIRK 604 EAST FOURTH STREET CHASKA, MN 55318 FILE #: 50560001 INVOICE DATE: 03/14/2018 INVOICE NUMBER: 70760

ATTORNEY: PETER GLEEKEL OFFICE: SAINT PAUL PAGE: 3

DATE	NAME	DESCRIPTION OF SERVICES	HOURS
02/13/2018	PJG	CORRESPONDENCE WITH COUNSEL FOR COMERICA REGARDING JOBU PRESENTS RELATED DOCUMENTATION; CONFER WITH COUNSEL FOR OMARR BAKER REGARDING DOCUMENTS RELATING TO	0.80
02/14/2018	PJG	INVESTIGATION OF JOBU PRESENTS TRANSACTION CORRESPONDENCE TO COUNSEL FOR JOBU PRESENTS REQUESTING INTERVIEW OF JOBU PRESENTS AND DOCUMENTS PERTAINING TO TRIBUTE CONCERT	0.30
02/15/2018	MTB	CORRESPONDENCE WITH COUNSEL FOR OMARR BAKER REGARDING DOCUMENTS AND MEMORANDUM; PREPARE KEY DOCUMENTS FOR ATTORNEY REVIEW FOR INVESTIGATION	1.30
02/19/2018	PJG	REVIEW AND STUDY MEMORANDUM AND EXTENSIVE EXHIBITS FROM COUNSEL FOR OMARR BAKER REGARDING JOBU PRESENTS AND TRIBUTE CONCERT	4.80
02/22/2018	BRP	CONFERENCE WITH COUNSEL FOR BREMER TRUST AND STRATEGY CONFERENCE RE INVESTIGATION OF JOBU TRANSACTION	1.10
02/22/2018	PJG	PREPARE FOR AND CONFER WITH COUNSEL FOR BREMER TRUST REGARDING INITIAL REQUEST FOR DOCUMENTS AND INTERVIEW OF WITNESSES; CONFER REGARDING SAME; COMMENCE REVIEW AND STUDY OF ADDITIONAL DOCUMENTATION RECEIVED FROM COMERICA'S COUNSEL REGARDING JOBU PRESENTS AND TRIBUTE CONCERT; CONFER WITH COUNSEL FOR JOBU PRESENTS REGARDING REQUEST FOR DOCUMENTATION AND INTERVIEW	4.70
02/23/2018	PJG	CONTINUE REVIEW AND STUDY OF ADDITIONAL DOCUMENTS RECEIVED FROM COUNSEL FOR COMERICA REGARDING JOBU PRESENTS TRANSACTION AND ISSUES IN RESPECT THEREOF	4.60
02/26/2018	MTB	REVIEW LETTER FROM BREMER'S COUNSEL REGARDING SECOND SPECIAL ADMINISTRATOR	0.30
02/26/2018	PJG ·	REVIEW AND STUDY CORRESPONDENCE FROM COUNSEL FOR BREMER TRUST TO JUDGE EIDE REGARDING SCOPE OF COURT ORDER EXPANDING AUTHORITY OF SECOND SPECIAL ADMINISTRATOR	0.20
02/27/2018	BRP	ANALYZE LETTER FROM COUNSEL TO BREMER TRUST TO JUDGE EIDE IN PREPARATION FOR DRAFT RESPONSE LETTER TO JUDGE EIDE	0.40
02/27/2018	BRP	PREPARE DRAFT RESPONSIVE LETTER TO JUDGE EIDE IN RESPONSE TO LETTER FROM BREMER TRUST	1.40
02/27/2018	PJG	CONFER REGARDING CORRESPONDENCE FROM COUNSEL FOR BREMER TRUST TO JUDGE EIDE CONCERNING SCOPE OF COURT ORDER EXPANDING AUTHORITY OF SECOND SPECIAL ADMINISTRATOR AND STRATEGY WITH RESPECT THERETO; CONFER WITH COUNSEL FOR OMARR BAKER REGARDING SAME	0.60
02/27/2018	PJG	CONTINUE REVIEW AND STUDY OF DOCUMENTS RECEIVED FROM COUNSEL FOR COMERICA REGARDING JOBU PRESENTS TRANSACTION	4,70

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CARVER COUNTY DISTRICT COURT

ATTN: YVONNE SHIRK 604 EAST FOURTH STREET CHASKA, MN 55318 FILE #: 50560001

INVOICE DATE: 03/14/2018

INVOICE NUMBER: 70760

ATTORNEY: PETER GLEEKEL OFFICE: SAINT PAUL

PAGE:

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DATE	NAME	DESCRIPTION OF SERVICES	·	HOURS
02/28/2018	PJG	REVISE AND EDIT DRAFT CORRESPONDENCE TO JUDGE EIDE RESPONDING TO BREMER TRUST CORRESPONDENCE SEEKING CLARIFICATION OF COURT'S ORDER EXPANDING AUTHORITY TO SECOND SPECIAL ADMINISTRATOR		0.70
TOTAL HOU	JRS:	52.20 TOTAL SERV	ICES:	\$ 20,186.00

#### TIMEKEEPER SUMMARY

<b>EMPL</b>	<u>INIT</u>	<u>NAME</u>	<u>RANK</u>	<b>HOURS</b>	<b>BILLING RATE</b>	<u>AMOUNT</u>
				<b>BILLED</b>		
0140	PJG	PETER J. GLEEKEL	PARTNER	43.40	430.00	18,662.00
0149	BRP	BRADLEY R. PROWANT	ASSOCIATE	2.90	200.00	580.00
1351	MTB	MARK T. BURNS	PARALEGAL	5.90	160.00	944.00

DATE	DESCRIPTION OF DISBURSEMENT	COST
-	Photocopy Expense - (1,742 @ 0.10 / PAGE)	174.20

TOTAL DISBURSEMENTS:

\$ 174.20

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CARVER COUNTY DISTRICT COURT

ATTN: YVONNE SHIRK 604 EAST FOURTH STREET

CHASKA, MN 55318

FILE #: 50560001

INVOICE DATE: 04/11/2018

INVOICE NUMBER: 71024

ATTORNEY: PETER GLEEKEL

OFFICE: SAINT PAUL

PAGE:

#### FOR PROFESSIONAL SERVICES & DISBURSEMENTS RENDERED THROUGH: March 31, 2018

MATTER	<u>LEGAL FEES</u>	<u>DISBURSEMENTS</u>	TOTAL
File #: 50560001	45,593.00 <b>PAYMENT</b>	3,574.98 <b>RECEIVED: 4/19/2018</b>	49,167.98 <b>-45,593.00</b>
	TOTAL	\$ 3,574.98	

#### ESTATE OF PRINCE ROGERS NELSON RE: PROBATE

	OU	TSTANDING INVOICES		
DATE	INVOICE	AMOUNT	PAYMENT	BAL DUE
03/14/2018	70760	\$ 20,360.20	\$ 20,186.00	\$ 174.20
04/11/2018	71024	\$ 49,167.98	\$ 45,593.00	\$ 3,574.98
05/11/2018	71332	\$ 19,616.89	\$ 0.00	\$ 19,616.89

Last Bill Date: 05/11/2018

Date of Last Payment: 04/19/2018

Amount of Last Payment: \$45,593.00

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Federal Tax ID No.: 41-1925028 Telephone: (651) 312-6589 or (651)312-6579 Facsimile: (651) 312-6618

CARVER COUNTY DISTRICT COURT ATTN: YVONNE SHIRK 604 EAST FOURTH STREET CHASKA, MN 55318

FILE #: 50560001 INVOICE DATE: 04/11/2018 INVOICE NUMBER: 71024 ATTORNEY: PETER GLEEKEL OFFICE: SAINT PAUL

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· DATE	NAME	DESCRIPTION OF SERVICES	HOURS
03/01/2018	BRP	STRATEGIZE RE RESEARCH ON BREACH OF FIDUCIARY DUTY AND	0.60
		BREACH OF CONTRACT RELATED TO JOBU TRANSACTION IN	
		RESPONSE TO LETTER FROM COUNSEL FOR BREMER TRUST	
03/01/2018	MTB	PREPARE KEY DOCUMENTS FOR GLEEKEL FROM BREMER TRUST	0.40
03/01/2018	PJG	REVIEW AND STUDY CORRESPONDENCE FROM COUNSEL FOR BREMER	1.40
		TRUST REGARDING BREMER TRUST'S POSITION ON JOBU	
		TRANSACTION AND \$2 MILLION REFUND; CORRESPONDENCE FROM	
		COUNSEL FOR OMARR BAKER REGARDING SAME; CORRESPONDENCE	
		TO JUDGE EIDE SUPPLEMENTING FEBRUARY 28 CORRESPONDENCE TO	
		COURT REGARDING RESPONSE TO BREMER TRUST'S	
		CORRESPONDENCE TO COURT SEEKING CLARIFICATION ON ORDER	
		EXPANDING SECOND SPECIAL ADMINISTRATOR'S INVESTIGATION	
		INTO JOBU TRANSACTION; CONFER REGARDING SAME AND	
		STRATEGY WITH RESPECT TO INVESTIGATION AND UNDERLYING	
		LEGAL PRINCIPALS	
03/02/2018	PJG	REVIEW AND STUDY CORRESPONDENCE AND ADDITIONAL	2.90
		DOCUMENTS FROM COMERICA COUNSEL CONSISTING OF	
		DOCUMENTS PRODUCED TO JOBU'S COUNSEL BY BREMER TRUST	
		CONCERNING THE JOBU DISPUTE; CONFER WITH COUNSEL FOR	
		COMERICA REGARDING ADDITIONAL DOCUMENT PRODUCTION IN	
		RESPECT OF JOBU TRANSACTION INCLUDING DOCUMENTS TO BE	
		WITHHELD BASED UPON PRIVILEGE AS DIRECTED BY COUNSEL FOR	
		BREMER TRUST; REVIEW AND STUDY CORRESPONDENCE FROM	
		COUNSEL FOR MR, KOPPELMAN/CAK REGARDING REQUEST FOR	
		INTERVIEW AND DOCUMENTS; REVIEW AND STUDY	
		CORRESPONDENCE FROM COUNSEL FOR MR, KOPPELMAN/CAK TO	
		JUDGE EIDE REGARDING SAME	
03/05/2018	BRP	STRATEGIZE RE A PERSONAL REPRESENTATIVE'S DUTY TO	0.50
		INVESTIGATE	
03/05/2018	MTB	REVIEW CORRESPONDENCE FROM COUNSEL REGARDING RESPONSE	0.40
		TO DOCUMENT REQUESTS AND OUTLINE DOCUMENT ISSUES	
03/05/2018	PJG	ADDITIONAL CORRESPONDENCE TO JUDGE EIDE REGARDING	6.70
		REQUEST FOR DOCUMENTS AND INTERVIEWS OF BREMER TRUST,	
		STINSON LEONARD, ETC.; CORRESPONDENCE TO COUNSEL FOR	
		BREMER TRUST CONCERNING CLARIFICATION OF DOCUMENTS TO BE	
		PRODUCED IN RESPONSE TO REQUEST FOR DOCUMENTS;	
		CORRESPONDENCE TO COUNSEL FOR MR, KOPPELMAN/CAK	
		RESPONDING TO COUNSEL'S LETTER OF 3/2/18; PREPARATION FOR	
		INTERVIEW WITH JOBU PRESENTS AND ITS COUNSEL; CONFER	

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CARVER COUNTY DISTRICT COURT

ATTN: YVONNE SHIRK 604 EAST FOURTH STREET

CHASKA, MN 55318

FILE #: 50560001

INVOICE DATE: 04/11/2018

INVOICE NUMBER: 71024

ATTORNEY: PETER GLEEKEL

OFFICE: SAINT PAUL

PAGE:

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DATE	NAME	DESCRIPTION OF SERVICES	HOURS
		REGARDING SAME; CONFER WITH COUNSEL FOR OMARR BAKER	
		REGARDING STATUS OF JOBU INVESTIGATION	
03/07/2018	PJG	REVIEW AND STUDY CORRESPONDENCE FROM ATTORNEY KRAMER	0.20
		REGARDING KOPPELMAN DOCUMENTS EARLIER FORWARDED BY MR.	
		KOPPELMAN TO STINSON LEONARD	
03/08/2018	PJG	CONFER WITH COUNSEL FOR COMERICA REGARDING STATUS OF JOBU	0.30
		INVESTIGATION AND CONSIDERATIONS WITH RESPECT THERETO	
03/09/2018	MTB	CORRESPONDENCE FROM COUNSEL FOR KOPPELMAN AND OUTLINE	0.40
		RESPONSE ISSUES FOR COUNSEL	
03/09/2018	PJG	REVIEW AND STUDY CORRESPONDENCE FROM JUDGE EIDE	5.10
		REGARDING JOBU INVESTIGATION AND ADDRESSING CONCERNS OF	
		BREMER TRUST, ET AL WITH RESPECT TO DOCUMENTS REQUESTED IN	
		CONNECTION WITH JOBU TRANSACTION; ADDITIONAL PREPARATION	
		FOR INTERVIEW OF JOBU PRESENTS, NEW YORK, NEW YORK;	
		CORRESPONDENCE FROM COUNSEL FOR MR. KOPPELMAN/CAK	
		REGARDING CONTINUING DIALOGUE OF REQUEST FOR PRODUCTION	
02/12/2010	BRP	OF DOCUMENTS AND INTERVIEW OF MR, KOPPELMAN	1.00
03/12/2018	BKP	TELEPHONE CONFERENCE WITH VAUGHN MILLETTE FROM JOBU	1.90
03/12/2018	PJG	PRESENTS  FINAL PREPARATION FOR AND APPEAR AT OFFICES OF DITUOL 7. LEVY	8.00
03/12/2018	. PJG	FINAL PREPARATION FOR AND APPEAR AT OFFICES OF RITHOLZ, LEVY	8.00
		AND CONDUCT INTERVIEW OF JOBU PRESENTS THROUGH MR,	
		MILLETTE, NEW YORK, NEW YORK; PREPARE MEMORANDUM REGARDING SAME	
03/13/2018	BRP	RESEARCH MINNESOTA LAW RE ATTORNEY CLIENT PRIVILEGE	1.60
03/13/2016	DKI	WITHIN THE CONTEXT OF AN ESTATE, PERSONAL REPRESENTATIVE,	1.00
		AND ATTORNEYS FOR THE PERSONAL REPRESENTATIVE	
03/13/2018	BRP	REVIEW LETTER FROM KASOWITZ, BENSON AND TORRES RE	0.40
03/13/2016	DKI	DISCOVERY REQUESTS AND STRATEGIZE RESPONSE	0.40
03/13/2018	BRP	STRATEGIZE RE INVESTIGATING WHETHER ESTATE HAS VIABLE	1.00
03/13/2010	DIG	CAUSES OF ACTION AGAINST JOBU, BREMER TRUST, OR ESTATE	1.00
		ADVISORS STEMMING FROM JOBU TRANSACTION	
03/13/2018	PJG	CONFER REGARDING INTERVIEW OF JOBU PRESENTS, LEGAL	2.80
00,10,2010		RESEARCH AND STRATEGY REGARDING SAME; CORRESPONDENCE TO	2,00
		COUNSEL FOR BREMER TRUST REGARDING CONTINUING DIALOGUE	
		ON PRODUCTION OF DOCUMENTS AND WITNESS INTERVIEWS;	
		ADDITIONAL CORRESPONDENCE TO COUNSEL FOR MR.	
		KOPPELMAN/CAK ON A CONTINUING DIALOGUE ON PRODUCTION OF	
		DOCUMENTS FROM MR. KOPPELMAN/CAK	
03/14/2018	PJG	REVIEW AND STUDY ADDITIONAL MULTIPLE CORRESPONDENCE	1,40
,,	<del>-</del>	FROM BREMER TRUST REGARDING IDENTIFICATION OF DOCUMENTS	
		TO BE PRODUCED IN RESPONSE TO REQUEST, ETC. TOGETHER WITH	
		EXHIBITS ATTACHED THERETO	

2800 Wells Fargo Place 30 East 7th Street Saint Paul, Minnesota 55101-4922

Federal Tax ID No.: 41-1925028 Telephone: (651) 312-6589 or (651)312-6579

Facsimile: (651) 312-6618

CARVER COUNTY DISTRICT COURT ATTN: YVONNE SHIRK 604 EAST FOURTH STREET

CHASKA, MN 55318

FILE #: 50560001 INVOICE DATE: 04/11/2018 INVOICE NUMBER: 71024

ATTORNEY: PETER GLEEKEL

OFFICE: SAINT PAUL

PAGE:

DATE	NAME	DESCRIPTION OF SERVICES	HOURS
03/15/2018	PJG	CORRESPONDENCE WITH COUNSEL FOR BREMER TRUST REGARDING INTERVIEW OF BREMER TRUST; ADDITIONAL REVIEW AND STUDY OF DOCUMENTS - FILES OF MR. MCMILLAN REGARDING JOBU PRESENTS EARLIER FORWARDED TO STINSON LEONARD; LEGAL RESEARCH REGARDING LAW OF CASE AND BREMER TRUST'S POSITION THAT STAYED DISCHARGE ORDER PREVENTS ANY POTENTIAL LIABILITY TO	6.60
02/16/2019	DDD	BE IMPOSED AGAINST BREMER TRUST	0.40
03/16/2018	BRP	STRATEGIZE RE POSSIBLE DAMAGES CALCULATIONS	0.40
03/16/2018	MTB	REVIEW AND ORGANIZE DOCUMENTS RECEIVED FROM KASOWITZ FIRM FOR COUNSEL	0.50
03/16/2018	PJG	CONFER REGARDING ADDITIONAL THOUGHTS CONCERNING ADDITIONAL LEGAL RESEARCH AND STRATEGY; REVIEW AND STUDY CORRESPONDENCE FROM COUNSEL FOR BREMER TRUST REGARDING DOCUMENT PRODUCTION AND PROPOSED STIPULATION CONCERNING PRIVILEGED INFORMATION	1,80
03/19/2018	MTB	LOAD AND REVIEW DOCUMENTS RECEIVED IN RESPONSE TO REQUESTS FOR INVESTIGATION DOCUMENTS	0.90
03/19/2018	PJG	CORRESPONDENCE WITH COUNSEL FOR KOPPELMAN/CAK REGARDING DOCUMENTS IN RESPONSE TO REQUESTS AND INTERVIEW OF MR. KOPPELMAN; CORRESPONDENCE TO JUDGE EIDE REGARDING STATUS OF JOBU PRESENTS INVESTIGATION	1.00
03/20/2018	PJG	CORRESPONDENCE WITH COUNSEL FOR BREMER TRUST IN CONTINUING DIALOGUE ON INTERVIEW OF IDENTIFIED STINSON LEONARD LAWYERS; COMMENCE REVIEW AND STUDY OF DOCUMENTS PRODUCED BY KOPPELMAN/CAK	2.80
03/21/2018	BRP	STRATEGIZE RE BREACH OF FIDUCIARY DUTY AND POSSIBLE DAMAGES THEREFROM	0.50
03/21/2018	МТВ	ATTEND TO DATABASE RELATING TO JOBU DOCUMENTS RECEIVED FROM PARTIES AND COUNSEL IN ORDER TO CONDUCT KEY DOCUMENT SEARCHES (.80) PREPARE AND ORGANIZE DOCUMENTS FOR MR. GLEEKEL IN PREPARATION OF WITNESS INTERVIEWS AND FOR INVESTIGATION OF JOBU ISSUE	0.80
03/21/2018	PJG	CONTINUE REVIEW AND STUDY OF DOCUMENTS PRODUCED BY KOPPELMAN/CAK; CONFER WITH COUNSEL FOR JOBU PRESENTS REGARDING FOLLOW-UP QUESTIONS FOR JOBU PRESENTS; CONFER REGARDING SAME; CORRESPONDENCE WITH COUNSEL FOR KOPPELMAN/CAK REGARDING PRODUCTION OF ADDITIONAL DOCUMENTS FROM KOPPELMAN/CAK AND KOPPELMAN INTERVIEW; COMMENCE REVIEW AND STUDY OF DOCUMENTS PRODUCED BY BREMER TRUST THROUGH STINSON LEONARD	7.80
03/22/2018	MTB	PREPARE AND ORGANIZE ADDITIONAL KEY DOCUMENTS FOR MR. GLEEKEL FOR WITNESS INTERVIEWS AND INVESTIGATION	3.70

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CARVER COUNTY DISTRICT COURT ATTN: YVONNE SHIRK 604 EAST FOURTH STREET CHASKA, MN 55318 FILE #: 50560001 INVOICE DATE: 04/11/2018 INVOICE NUMBER: 71024 ATTORNEY: PETER GLEEKEL

OFFICE: SAINT PAUL PAGE: 5

DATE	NAME	DESCRIPTION OF SERVICES	HOURS
03/22/2018	PJG	CONTINUE REVIEW AND STUDY OF DOCUMENTS PRODUCED BY BREMER TRUST THROUGH STINSON LEONARD; REVIEW AND STUDY SUPPLEMENTAL DOCUMENTS PRODUCED FROM COUNSEL FOR BREMER TRUST; REVIEW AND STUDY SUPPLEMENTAL DOCUMENTS	6.10
03/23/2018	BRP	PRODUCED BY COUNSEL FOR KOPPELMAN/CAK RESEARCH MINNESOTA LAW RE FIDUCIARY DUTY OF PERSONAL REPRESENTATIVE AND ADVISORS HIRED THEREBY TO ESTATE	2.10
03/23/2018	MTB	PREPARATION OF ADDITIONAL DOCUMENTS FOR WITNESS INTERVIEWS AND INVESTIGATION INTO JOBU ISSUE AS OUTLINED BY	2.00
03/23/2018	PJG	COURT CONTINUE AND COMPLETE REVIEW AND STUDY OF DOCUMENTS PRODUCED BY BREMER TRUST THROUGH STINSON LEONARD	2.60
03/26/2018	BRP	RESEARCH THE FIDUCIARY OBLIGATION OF AN AGENT HIRED BY AN ESTATE'S PERSONAL REPRESENTATIVE	2.80
03/26/2018	MTB	PREPARE DOCUMENTS FOR MR. GLEEKEL FOR WITNESS MEETINGS AND INVESTIGATION; PREPARE WITNESS PREPARATION MATERIALS	1.60
03/26/2018	BRP	PARTICIPATE IN INTERVIEWS OF MR. ORDAL AND MS. FASEN OF BREMER TRUST CONCERNING JOBU TRANSACTION	4.00
03/26/2018	PJG	PREPARE FOR AND MEET AND CONFER WITH MR. ORDAHL AND MS. FASSEN OF BREMER TRUST CONCERNING JOBU PRESENTS	6.70
03/27/2018	PJG	INVESTIGATION AT OFFICES OF STINSON LEONARD PREPARE FOR INTERVIEW OF STINSON LEONARD LAWYERS LAURA HALFERTY AND DAVID CROSBY	4.70
03/28/2018	MTB	REVIEW ADDITIONAL DOCUMENTS AND PREPARE FOR COUNSEL FOR WITNESS MEETINGS AND INVESTIGATION	0.70
03/28/2018	PJG	FINAL PREPARATION FOR AND MEET AND INTERVIEW DAVID CROSBY OF STINSON LEONARD AT OFFICES OF STINSON LEONARD; REVIEW AND STUDY CORRESPONDENCE FROM COUNSEL FOR MR. MCMILLAN IN RESPONDING TO REQUEST FOR AN INTERVIEW AND DOCUMENTS PERTAINING TO JOBU PRESENTS; PREPARE FOR INTERVIEW OF KOPPELMAN/CAK, NEW YORK, NEW YORK	9.20
03/28/2018	BRP	PARTICIPATE IN INTERVIEW OF DAVID CROSBY, STINSON LEONARD	3.80
03/28/2018	BRP	PREPARATION FOR INTERVIEW OF CHARLES KOPPELMAN, N.Y, N.Y.	5.70
03/29/2018	PJG	FINAL PREPARATION FOR AND CONDUCT INTERVIEW OF KOPPELMAN/CAK AT OFFICES OF KASOWITZ, BENSON & TORRES, NEW YORK, NEW YORK; CONFER REGARDING SAME	8.00
03/29/2018	BRP	PARTICIPATE IN INTERVIEW OF CHARLES KOPPELMAN AT OFFICES OF KASOWITZ, BENSON & TORRES, N.Y., N.Y.; CONFER REGARDING SAME	8.00
03/30/2018	PJG	CORRESPONDENCE TO COUNSEL FOR MR. MCMILLAN REGARDING CONTINUING REQUEST FOR INTERVIEW OF MR. MCMILLAN AND RESPONDING TO MR. MCMILLAN'S COUNSEL'S PROPOSAL WITH RESPECT THERETO	0.20

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CARVER COUNTY DISTRICT COURT ATTN: YVONNE SHIRK 604 EAST FOURTH STREET

CHASKA, MN 55318

FILE #: 50560001 INVOICE DATE: 04/11/2018 INVOICE NUMBER: 71024

ATTORNEY: PETER GLEEKEL
OFFICE: SAINT PAUL
PAGE: 6

DATE NAME

DESCRIPTION OF SERVICES

HOURS

TOTAL HOURS:

131.00

TOTAL SERVICES:

\$ 45,593.00

#### TIMEKEEPER SUMMARY

<u>EMPL</u>	<u>INIT</u>	<u>NAME</u>	<u>RANK</u>	HOURS	<b>BILLING RATE</b>	<u>AMOUNT</u>
				<u>BILLED</u>		
0140	PJG	PETER J. GLEEKEL	PARTNER	86.30	430.00	37,109.00
0149	BRP	BRADLEY R. PROWANT	ASSOCIATE	33.30	200.00	6,660.00
1351	MTB	MARK T. BURNS	PARALEGAL	11.40	160.00	1,824.00